



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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January 25, 2006

Mr. Edward O. Robertson, Principal Planner
Department of Planning and Zoning
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

Draft Mitigated Negative Declaration for the Proposed Terra Vita Project, 3.2807 – TTM 33936

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC060110-11
Control Number

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1. In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes the construction of a 42-unit condominium complex and other construction on a 4.65-acre site, but does not quantify the project's construction or operation air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2002 land use emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/models.html> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

2. In the Transportation/Circulation Section 15.a. through 15.g, the lead agency discusses transportation impacts but does not disclose potential project traffic impacts for intersections potentially affected by the proposed project. The lead agency concludes, that "The proposed project is consistent with the City of Palm Springs General Plan Circulation Element (1992)" but does not provide even a summary of a current traffic study to support that finding. For the purposes of evaluating the proposed project's traffic impacts for CO hotspots analysis, the lead agency should at minimum include the following in the Final MND to demonstrate that the potential for CO hotspots is less than significant. The lead agency should identify the intersection(s) that would be affected by the proposed project; quantify the level of service and volume to capacity effects of the proposed project. Quantifying existing traffic volumes, the proposed traffic impacts and the impacts from any proposed mitigation measures are important because the results may warrant performing a CO hotspots analysis. The SCAQMD recommends performing the CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.

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Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:

<http://www.dot.ca.gov/hq/env/air/coprot/htm> .

Local Significance Threshold

3. Because the proposed site is located less than a quarter-mile from an existing multi-family residential site and another residential tract (Tract 31945) is currently being developed, a localized air quality analysis may be warranted to ensure that the residents in the existing multi-family site are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .